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March 7, 2022

Honorable Mary Kay Vyskocil  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

USDC SDNY  
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**Re: Meriyen Dominguez v. St. Barnabas Hospital et al.**  
**Case 1:21-cv-08080-MKV**

Dear Judge Vyskocil:

Please be advised that we represent the Plaintiff in the above-mentioned matter. The parties write jointly to request a stay of discovery. Counsel for both parties have discussed the potential to settle this matter and, to this end, we have scheduled a mediation through the mediation firm, JAMS, for April 26<sup>th</sup>, 2022 beginning at 9:30 am. As respective counsel for plaintiff and defendants, our offices have had other matters together which we have been able to amicably resolve. Accordingly, to save the costs associated with further litigation and preserve judicial resources, we ask, respectfully, that this Honorable Court stay discovery until we report back to your Honor on April 27<sup>th</sup>, the day following mediation. It is our hope that, at that time, we can report a settlement. In the event a settlement is not reached, we intend to inform your Honor that this matter has not been settled and request continuing dates for the completion of discovery.

Additionally, we write to advise your Honor that the Plaintiff is deaf and seeks two American Sign Language (“ASL”) interpreters at the mediation. We have reached out to the Court Interpreter’s Office and we were informed that the Court Interpreter’s Office can provide two ASL interpreters at the mediation if it is in receipt of a court-order directing mediation. Accordingly, we respectfully ask that your Honor issue a court order for the mediation.

We thank your Honor in advance for your consideration in this matter.

Respectfully submitted,

/s/Clara R. Smit, Esq.  
Clara R. Smit, Esq.  
/s/ Bruce J. Gitlin  
Bruce J. Gitlin, Esq.

/s/ Marc Sittenreich, Esq.

Marc Sittenreich, Esq.

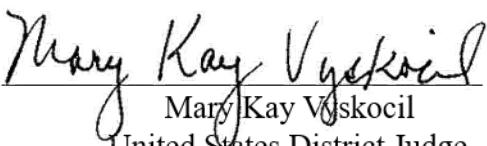
/s/ Andrew Zwerling, Esq.

Andrew Zwerling, Esq.

CRS/br

**DENIED. The Court cannot order the parties to engage in private mediation. The parties are free to engage in private mediation if they so wish, but must bear their own costs. The Court will also not stay discovery in this case. SO ORDERED.**

Date: 3/10/2022  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge